

**IN THE DISTRICT COURT FOR THE STATE OF ALASKA
THIRD JUDICIAL DISTRICT AT PALMER**

JESSICA SEDLACEK,

Plaintiff,

CLAYTON R. SALIKIE, and
WALMART TRANSPORTATION, LLC,

Defendants.

Case No. 3PA-13-01307 CI

COMPLAINT FOR DAMAGES

The Plaintiff, Jessica Sadlacek, by and through her counsel, The Law Office of Jason Skala, LLC and for her cause of action against the Defendants, alleges as follows:

JURISDICTIONAL ALLEGATIONS

1. Plaintiff Jessica Sadlacek is and at all times relevant hereto was a resident of Anchorage, Alaska.
2. This case arises out the activities of Defendants Clayton R. Salikie ("Salikie") and Walmart Transportation, LLC, ("Walmart") in Alaska such that courts in Alaska may assert personal jurisdiction over such parties without offending notions of fair play and substantial justice. Plaintiff is informed and believes and on that basis alleges that Defendant Salikie is a resident of Oregon. Plaintiff is further informed and believes and on that basis alleges that Walmart is a Delaware corporation.
3. At all relevant times, Defendant Salikie was acting as the agent of Defendant Walmart in the course and scope of his duties such that Defendant Walmart is liable for Defendant Salikie's actions.
4. On or about April 7, 2011, Defendant Muir was driving his Kenworth pulling a Walmart trailer on the Glenn Highway near milepost 78.5 when he failed to drive at a safe operating speed

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for conditions and failed to maintain control of his vehicle, causing the Walmart trailer to cross into oncoming traffic, striking a recreational vehicle ("RV") in which Plaintiff was a restrained passenger. The RV collided with a guardrail and totalling the vehicle and injuring Plaintiff.

5. After causing the collision, Defendant Salikie failed to stop and left the scene of the accident.
6. The cause of the collision was the negligent operation of the Kenworth by Defendants.
7. As a result of such negligence, Plaintiff was injured.
8. As a result of such negligence, Plaintiff has suffered losses, including past and future economic and non-economic losses in an amount to be proven at trial but less than \$74,999.99.

SECOND CAUSE OF ACTION
(Negligent hiring/training against Walmart)

9. Plaintiff realleges and incorporates by reference the allegations of Paragraphs 1 through 8 of this Complaint as if set forth in full hereat.
10. It is Plaintiff's information and belief that Defendant Walmart's hiring, training and/or supervision of Defendant Salikie was negligent.
11. As a result of such negligence, Plaintiff has suffered losses, including but not limited to, past and future economic and non-economic losses in an amount to be proven at trial but less than \$74,999.99.

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PRAYER FOR RELIEF

WHEREFORE, Plaintiff requests the following relief:

1. A judgment against Defendant in an amount to be proven at trial but less than \$74,999.99.
2. Plaintiff's costs and attorneys' fees.
3. Such other relief as the Court deems just and appropriate.

RESPECTFULLY SUBMITTED this 3 day of April, 2013, at Anchorage, Alaska.

LAW OFFICE OF JASON SKALA, LLC



Jason Skala, ASBN 0105031
Attorney for Jessica Sedlacek